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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA,

10 AXS GROUP LLC,
11 Plaintiff,
12 v.
13 INTERNET REFERRAL SERVICES,
14 LLC, EVENT TICKETS CENTER,
14 INC., VERIFIED-TICKET.COM
15 AMOSA.APP, and SECURE.TICKETS,
16 Defendants.

Case No. 2:24-CV-00377 CAS (EX)

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION**

Honorable Christina A. Snyder

Date: February 26, 2024

Time: 10:00 am

Courtroom: 8D

Complaint filed: January 16, 2024

17 This Court, having read and considered the Verified Complaint on file in this
18 action by Plaintiff AXS Group LLC ("AXS"), AXS's Motion for a Preliminary
19 Injunction, and the Declaration of Alex Hazboun filed in support thereof, hereby
20 finds good cause exists for the preliminary injunction and GRANTS the motion as
21 set forth herein.

22 **I. Definitions**

23 For purposes of this Order, the following definitions apply:

24 1. **"AXS Marks"** means the terms "AXS Mobile ID," "Flash Seats," and
25 the AXS U.S. trademark registrations identified in the Complaint.

26 2. **"AXS App"** means the software application developed by AXS that
27 allows a consumer to buy, sell, view, and use an Electronic Ticket. The AXS App is
28 available for download on both the App Store and Google Play.

1 3. **“AXS QR Code”** means the proprietary two-dimensional barcode
2 created by AXS that appears as a square pattern of black and white squares that
3 encodes data on an Electronic Ticket.

4 4. **“Electronic Device”** means any personal computer, cell phone,
5 smartphone, tablet, or other wireless device.

6 5. **“Electronic Ticket”** means a document produced in digital form used
7 by a consumer to access a venue hosting a concert, sporting event, or any other type
8 of entertainment.

9 6. **“Google Play”** means the digital distribution platform operated by
10 Google, LLC where software and other digital applications can be accessed and
11 downloaded.

12 7. **“App Store”** means the digital distribution platform operated by Apple,
13 Inc. where software and other digital applications can be accessed and downloaded.

14 **II. Terms of Injunction**

15 The Defendants, including any of their officers, employees, agents, servants,
16 and attorneys, and all persons in active concert or participation with any of them
17 (regardless of whether located in the U.S. or abroad), who receive actual notice of
18 this Order (hereinafter collectively referred to as the “Restrained Persons”), are
19 hereby restrained and enjoined from engaging in the following acts for the pendency
20 of this matter:

21 1. Downloading the AXS App onto any Electronic Device from the App
22 Store, Google Play, or any similar third party platform where the AXS App can be
23 accessed and downloaded;

24 2. Manufacturing, generating, or otherwise creating an Electronic Ticket
25 bearing any of the AXS Marks or the AXS QR Code;

26 3. Distributing, disseminating, or otherwise sending to any third party any
27 communication containing an Electronic Ticket bearing any of the AXS Marks or the
28 AXS QR Code;

1 4. Using the AXS Marks on any website or other advertising or
2 promotional material of any kind.

3 5. Secreting, concealing, destroying, altering, selling, transferring, or
4 otherwise disposing of any computer files, data, business records, documents, or any
5 other records pertaining or relating to any Restrained Person's: (a) prior use of the
6 AXS Marks; (b) prior conduct of manufacturing, generating, or otherwise creating
7 an Electronic Ticket bearing any of the AXS Marks or the AXS QR Code; or (c) prior
8 conduct of distributing, disseminating, or otherwise sending to any third party any
9 communication containing an Electronic Ticket bearing any of the AXS Marks or the
10 AXS QR Code.

12 IT IS SO ORDERED.

14 | SIGNED this day of , 2024, at .m.

UNITED STATES DISTRICT JUDGE